

HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134

Bryce K. Kunimoto, Esq.  
Nevada Bar No. 7781  
Robert J. Cassity  
Nevada Bar No. 9779  
David J. Freeman  
Nevada Bar No. 10045  
HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
Phone: (702) 222-2542  
Fax: (702) 669-4650  
[bkunimoto@hollandhart.com](mailto:bkunimoto@hollandhart.com)  
[bcassity@hollandhart.com](mailto:bcassity@hollandhart.com)  
[dfreeman@hollandhart.com](mailto:dfreeman@hollandhart.com)

*Attorneys for Defendant Victor Chang*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUDIO VISUAL SERVICES GROUP, INC.  
d/b/a PSAV PRESENTATION SERVICES, a  
Delaware Corporation,

Plaintiff,

v.

VICTOR CHANG, an individual,

Defendant.

CASE NO.: 2:15-cv-01449-APG-VCF

**STIPULATION AND PROPOSED  
ORDER FOR ENLARGEMENT OF  
TIME FOR DEFENDANT VICTOR  
CHANG TO RESPOND TO THE  
COMPLAINT FOR INJUNCTIVE  
RELIEF AND DAMAGES, EXTEND  
TEMPORARY RESTRAINING ORDER  
AND CONTINUE HEARINGS**

**(Second Request)**

Defendant Victor Chang (“Mr. Chang” or “Defendant”) and Plaintiff Audio Visual Services Group, Inc. d/b/a PSAV Presentation Services (“PSAV” or “Plaintiff”), by and through their respective attorneys of record, pursuant to Federal Rule of Civil Procedure 6(b)(1), and Local Rule 6-1, hereby stipulate and agree as follows:

1. Plaintiff commenced this action on July 29, 2015 by filing its *Complaint for Injunctive Relief and Damages* (Dkt #1).

2. On July 29, 2015, Plaintiff also filed an *Emergency Ex Parte Motion for Temporary Restraining Order, Preliminary Injunction and Supporting Memorandum of Points and Authorities* (Dkt. #5) wherein Plaintiff sought to enjoin Mr. Chang from describing, disclosing, misappropriating, publishing, taking, transmitting, transferring, or using for any

1 purposes certain information Plaintiff contends is confidential and/or proprietary (the  
2 “Confidential and Trade Secret Information”).

3 3. On July 30, 2015, the Court entered a *Temporary Restraining Order* (Dkt. #7)  
4 (the “TRO”), which required Mr. Chang to, among other things, recall and deliver to Plaintiff all  
5 original and copies of any and all correspondence, documents and other material containing,  
6 referring or relating to the Confidential and Trade Secret Information, which are in his  
7 possession, custody or control, and to refrain from altering, deleting, modifying or removing any  
8 data from any and all personal data devices.

9 4. The TRO also required Mr. Chang to file and serve upon Plaintiff’s counsel  
10 within ten (10) days after entry of the TRO a written notice, under oath, setting forth in detail the  
11 manner in which he has complied with the TRO (the “Written Notice”).

12 5. Further, the TRO set a hearing on Monday, August 10, 2015, at 3:30 p.m. at  
13 which time the Court would hear oral argument and decide whether to extend the TRO or grant  
14 preliminary injunctive relief (the “Preliminary Hearing”).

15 6. The Summons, Complaint and TRO were served upon Mr. Chang on or about  
16 July 31, 2015. Accordingly, the date by which the Written Notice is required to be filed and  
17 served is Monday, August 10, 2015. The deadline for Mr. Chang to file an answer or otherwise  
18 respond to the Complaint is August 21, 2015.

19 7. On August 6, 2015, the Court entered an *Order* (Dkt #10) setting a status hearing  
20 to determine additional briefing on the issue of Plaintiff’s request for permission to enter Mr.  
21 Chang’s premises and work location to identify and inspect locations where the information at  
22 issue may be stored, which was set for August 14, 2015 at 2:00 p.m. (the “Status Hearing”).

23 8. On or about August 7, 2015 and pursuant to the parties’ *Stipulation and Proposed*  
24 *Order to Extend Temporary Restraining Order and Continue Hearings* (Dkt. #15) (the “First  
25 Stipulation and Order”), the Court issued an order extending and/or continuing the following  
26 deadlines:

- 27 a. The Preliminary Hearing for a period of ten (10) days to  
28 August 20, 2015, or as soon thereafter as the Court’s  
schedule will allow;

HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134

- b. The Temporary Restraining Order (Dkt. #7), filed on July 30, 2015, until the continued date of the Preliminary Hearing;
- c. The deadline for Mr. Chang to file and serve the Written Notice for a period of ten (10) days to August 20, 2015; and
- d. The Status Hearing for a period of ten (10) days to August 24, 2015, or as soon thereafter as the Court's schedule will allow.

9. On or about August 12, 2105 and pursuant to the First Stipulation and Order, the Magistrate Judge ordered that the Status Hearing be rescheduled to 11:00 a.m., August 24, 2015 (Dkt. #16).

10. On or about August 18, 2105 and pursuant to the First Stipulation and Order, the Court ordered that the Preliminary Hearing be rescheduled to 9:00 a.m., August 26, 2015 (Dkt. #17).

11. The parties are currently coordinating the preservation and return of the Confidential and Trade Secret Information without additional Court intervention.

12. To date, a third-party vendor has forensically imaged Mr. Chang's cell phone, personal laptop, the laptop's original hard drive and an external hard drive and downloaded all emails and folders from Mr. Chang's personal Gmail account in order to preserve any and all electronically-stored information ("ESI") that may be at issue.

13. The parties are currently in the process of reviewing the ESI to ensure compliance with the TRO.

14. WHEREFORE, the parties stipulate and agree to enlarge the time for Mr. Chang to answer or otherwise respond to the Complaint, extend the deadline for Mr. Chang to file and serve the Written Notice and to continue the Preliminary and Status Hearings as follows:

- a) The parties agree to enlarge the time for Mr. Chang to answer or otherwise respond to the Complaint, filed on July 29, 2015, for thirty-one (31) days to September 21, 2015;
- b) The parties agree to extend the *Temporary Restraining Order* (Dkt. #7), filed on July 30, 2015, until the continued date of the Preliminary Hearing as set forth below;

- 1 c) The parties agree to extend the deadline for Mr. Chang to file and  
2 serve the Written Notice, until the continued date of the  
3 Preliminary Hearing as set forth below;  
4 d) The parties agree to continue the Preliminary Hearing for a period  
5 of twenty (20) days to September 15, 2015, or as soon thereafter as  
6 the Court's schedule will allow; and  
7 e) The parties agree to continue the Status Hearing for a period of  
8 seventeen (17) days to September 10, 2015, or as soon thereafter as  
9 the Court's schedule will allow.

10 15. This Stipulation is submitted prior to the expiration of the period provided for (1)  
11 the filing and service of Mr. Chang's response to the Complaint (August 21, 2015), (2) the filing  
12 and service of the Written Notice (August 20, 2015), (3) the Status Hearing (August 24, 2015)  
13 and (4) the Preliminary Hearing (August 26, 2015), is not interposed merely for delay, and is  
14 made in good faith between the parties hereto. The parties have made one similar prior request.

15 **IT IS SO STIPULATED:**

16 DATED August 20, 2015.

17 DATED August 20, 2015.

18 /s/ David J. Freeman

19 /s/ Dennis D. Leone

20 Bryce K. Kunimoto, Esq.  
21 Robert J. Cassity, Esq.  
22 David J. Freeman, Esq.  
23 HOLLAND & HART LLP  
24 9555 Hillwood Drive, 2nd Floor  
25 Las Vegas, Nevada 89134  
26 *Attorneys for Defendant Victor Chang*

27 Joseph R. Ganley, Esq.  
28 Patricia Lee, Esq.  
HUTCHISON & STEFFEN, LLC  
10080 W. Alta Drive, Suite 200  
Las Vegas, Nevada 89145  
Dennis D. Leone (*Pro hac vice*)  
Jonathan K. Stitt (*Pro hac vice*)  
SHANKMAN LEONE, P.A.  
707 N. Franklin Street, 5th Floor  
Tampa, Florida 33602  
*Attorneys for Plaintiff PSAV*

29 **IT IS SO ORDERED** this 24th day of August, 2015.

30   
31 UNITED STATES DISTRICT JUDGE